

# EXHIBIT A

Barkat G. Ali - January 5, 2021

<p>1 IN THE UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF TEXAS 3 DALLAS DIVISION 4 HARRISON COMPANY LLC, ) 5 Plaintiff, ) 6 VS. ) NO. 3:19-CV-1057-B 7 A-Z WHOLESALERS INC. and ) 8 BARKAT G. ALI, ) 9 Defendants. )</p> <p>10</p> <p>11 ORAL AND VIDEOTAPED DEPOSITION OF 12 BARKAT G. ALI 13 JANUARY 5, 2021 14 (Reported Remotely)</p> <p>15</p> <p>16 ORAL AND VIDEOTAPED DEPOSITION of BARKAT 17 G. ALI, produced as a witness at the instance of the 18 Plaintiffs, and duly sworn, was taken in the 19 above-styled and numbered cause on the 5th of January, 20 2021, from 10:59 a.m. to 5:07 p.m., before Audra B. 21 Paty, CSR in and for the State of Texas, reported by 22 machine shorthand, at 616 Clariden Ranch Road, in the 23 City of Southlake, County of Tarrant, State of Texas, 24 pursuant to Notice and the Federal Rules of Civil 25 Procedure.</p>	<p style="text-align: center;">1 I N D E X 2 WITNESS 3 BARKAT G. ALI 4 EXAMINATION BY MR. UNIS 5 CORRECTIONS MADE BY WITNESS 6 SIGNATURE OF WITNESS 7 REPORTER'S CERTIFICATION 8 EXHIBITS 9 IDENTIFIED 10 Exhibit 2 - Harrison Credit Application 11 Exhibit 3 - Harrison Company, LLC Terms and Conditions 12 Exhibit 7 - Defendant Barkat G. Ali's Responses and Objections to Plaintiff's First Set of Discovery Requests 13 Exhibit 9 - Defendant Barkat Ali's Response to Plaintiff's Second Set of Discovery Requests 14 Exhibit 10 - 9-10-18 Baquet letter to A-Z Wholesalers and A. Ali and B. 15 Exhibit 13 - 4-10-14 Baquet e-mail to Baquet 16 Exhibit 15 - Declaration of Barkat G. Ali 17 Exhibit 16 - Declaration of Amar B. Ali 18 Exhibit 17 - E-mail string top e-mail 11-24-14 Barkat e-mail Albritton 19 Exhibit 18 - E-mail string top e-mail 12-22-14 20 Barkat e-mail to Thomas 21 22 23 24 25</p> <p style="text-align: right;">PAGE 7 177 178 179 52 58 91 101 108 119 119 XX 131 133</p>
<p style="text-align: center;">2</p> <p>A P P E A R A N C E S</p> <p>FOR THE PLAINTIFF: Mr. Joseph Anthony Unis, Jr. Mr. David L. Swanson Ms. Anna K. Finger LOCKE LORD LLP 2200 Ross Avenue Suite 2800 Dallas, Texas 75201 214.740.8000 junis@lockelord.com dswanson@lockelord.com anna.k.finger@lockelord.com</p> <p>FOR THE DEFENDANTS: Ms. Joyce W. Lindauer Ms. Kerry S. Alleyne JOYCE W. LINDAUER, PLLC 1412 Main Street Suite 500 Dallas, Texas 75202 972.503.4033 joyce@joycelindauer.com kerry@joycelindauer.com</p> <p>ALSO PRESENT: Mr. Amar Ali Mr. Guy Tubbs, Videographer</p>	<p style="text-align: right;">4</p> <p>1 EXHIBITS IDENTIFIED 2 Exhibit 19 - E-mail string top e-mail 2-27-15 A. Ali e-mail to B. Ali 135 3 Exhibit 20 - E-mail string top e-mail 3-5-15 4 Albritton e-mail to Barkat and Ali 138 5 Exhibit 23 - E-mail string top e-mail 3-26-15 Albritton e-mail to Barkat 139 6 Exhibit 29 - 10-30-15 Prendergrast to A. Ali 142 7 Exhibit 34 - Declaration of Sandy Zazulak 152 8 Exhibit 35 - Spreadsheet 158 9 Exhibit 38 - Defendant's First Amended Answer to Plaintiff's Original Complaint 159 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">61</p> <p>1 Amar was running -- operating the place. 2 Q. Same goes for the Waco warehouse, correct? 3 You have no reason to dispute that Harrison delivered 4 product to the A-Z warehouse in Waco, right? 5 A. I don't know. I don't know. 6 Q. You don't know because you weren't involved, 7 correct? 8 A. Yes. 9 Q. You don't have any personal knowledge of that 10 process, do you, sir? 11 A. Yes, I don't have personal knowledge. 12 Q. Would anyone other than Amar have knowledge 13 of that process? 14 A. You can ask Amar. 15 Q. Okay. I'm asking you, sir. Are you aware of 16 anyone other than Amar having knowledge of that 17 process? 18 A. No. 19 Q. And you don't have any personal knowledge 20 about the account numbers that Harrison set up for A-Z 21 under the credit agreement, do you, sir? 22 A. No, I don't. 23 Q. And you don't have any personal knowledge of 24 A-Z's ordering process when it would order product 25 from Harrison, do you, sir?</p>	<p style="text-align: right;">63</p> <p>1 Q. And you don't know how much product Harrison 2 was delivering; is that correct? 3 A. No, I don't know. 4 Q. Is there anything you know about the ordering 5 or the delivery process under this Exhibit 4 credit 6 agreement? 7 A. I don't know. 8 Q. I'm sorry. This is actually Exhibit 3. I 9 misspoke. So you don't know anything about the 10 ordering process, correct? 11 A. No. 12 Q. And you don't know anything about the 13 delivery process, right? 14 A. No. 15 Q. Were you ever at the warehouse in Dallas when 16 Harrison delivered product to A-Z? 17 A. No, I'm not there. I was never -- I just 18 went some time and that's it. 19 Q. So you never observed a Harrison truck 20 unloading product at the warehouse in Dallas? 21 A. Not really. 22 Q. Not really? 23 A. Don't remember. 24 Q. You don't recall ever seeing a Harrison truck 25 unload product at the warehouse in Dallas?</p>
<p style="text-align: right;">62</p> <p>1 A. No, I don't. 2 Q. You don't know how A-Z placed those orders, 3 do you? 4 A. I don't know that. 5 Q. And you don't know how Harrison filled those 6 orders, correct? 7 A. I don't know. 8 Q. You're totally uninvolved, right, that's what 9 you told me? 10 A. Yes. 11 Q. So you don't know who anyone at A-Z spoke to 12 at Harrison, right? 13 A. No. 14 Q. And you don't know how often A-Z was ordering 15 product from Harrison, do you, sir? 16 A. I don't know that. 17 Q. You don't know how often Harrison was 18 delivering product, correct? 19 A. I don't know. 20 Q. And you don't know how much product A-Z was 21 ordering; is that right? 22 A. I don't know. 23 Q. You don't know what it was paying for the 24 product it was ordering? 25 A. No, I don't know.</p>	<p style="text-align: right;">64</p> <p>1 A. Not really. Really don't remember. 2 Q. And do you recall ever seeing a Harrison 3 truck unload product at the warehouse in Waco? 4 A. Yeah, it was far away. I don't know. 5 Q. How often would you go to the Waco warehouse? 6 A. I think I have been only two, three times all 7 these years. That's it. 8 Q. Do you recall the last time you were at the 9 warehouse in Waco? 10 A. Maybe a few years ago. 11 Q. Do you recall why you went to the warehouse 12 in Waco a few years ago? 13 A. Just was passing by, just stopped by. 14 Q. So you have no idea what the Harrison trucks 15 look like; is that correct? 16 A. I really don't, no. I don't remember. 17 Q. And do you know who at A-Z would be 18 responsible for receiving any delivery from Harrison? 19 A. I don't know. 20 Q. And you have no idea what type of 21 documentation was involved either on the Harrison side 22 or the A-Z side when ordering and delivering product, 23 do you, sir? 24 A. No, I don't know. 25 Q. Other than Amar, do you know who would be</p>

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<p style="text-align: right;">77</p> <p>1 Prendergrast doesn't work for Harrison? 2 A. I met him when -- I think later on. He came 3 and introduced himself I think at the warehouse one 4 day and said he's chief financial officer or chief 5 operating officer. I don't know. He was coming from 6 Imperial. Imperial. 7 Q. And you would agree it's possible for one 8 person to be associated with two entities, correct? 9 A. No, he wasn't presenting as Imperial officer. 10 Q. Sir, you yourself are affiliated with three 11 entities at least, right? 12 A. So what. I can be ten. 13 Q. Exactly. 14 A. But he was from Imperial. 15 Q. And what is the basis for that understanding, 16 sir? 17 A. I vaguely remember he gave me a business card 18 which said Imperial and he was chief operating officer 19 or chief financing officer, something. He gave me a 20 card, business card, that said Imperial. 21 Q. Okay Who is Brad Albritton? Do you know? 22 A. No, I don't remember. 23 Q. Is that name familiar to you? 24 A. No, I don't remember. 25 Q. What about Wayne Baquet?</p>	<p style="text-align: right;">79</p> <p>1 you goods is based on what, sir? 2 A. Question repeat again. 3 MR. UNIS: Madam Court Reporter, could 4 you please read back the question? 5 (Record read.) 6 A. Yeah, based on writing checks. I was signing 7 the checks. Not writing, but signing the checks. 8 Q. (BY MR. UNIS) Okay. Anything other than how 9 you would make out checks to support your opinion? 10 A. That's all. I was signing the checks. 11 Q. So nothing other than the checks, correct? 12 A. Yes. 13 Q. You weren't there receiving deliveries, 14 right, at A-Z? 15 A. No. 16 Q. And you weren't placing the orders, were you, 17 sir? 18 A. No. 19 Q. And you told me earlier you don't know how 20 those orders were being filled, correct? 21 A. Uh-huh. 22 Q. Who was filling those orders? 23 A. I don't know. 24 Q. What those trucks looked like, correct? 25 A. Yes.</p>
<p style="text-align: right;">78</p> <p>1 A. I know I met Wayne Baquet, but I know he's 2 the president of Imperial. 3 Q. How do you know that? 4 A. Amar. I was told by Amar. 5 Q. Amar told you? 6 A. Yes. 7 Q. You never met Wayne? 8 A. I never met Wayne. 9 Q. Did you meet Brad Prendergrast? 10 A. I met him one time. 11 Q. When was that? 12 A. I don't remember. I don't remember really. 13 Met him maybe four years ago, three years ago. 14 Q. Do you remember where you met him? 15 A. At A-Z. 16 Q. In Dallas? 17 A. Yes. 18 Q. And you made reference to Imperial. That's 19 Imperial Trading Company, LLC, correct? 20 A. No, I don't know exact name. 21 Q. What do you know about Imperial? 22 A. I don't know. Imperial was -- is a company 23 that was sending us goods, and I was signing the 24 checks. I remember -- that's all I remember. 25 Q. And your opinion that Imperial was sending</p>	<p style="text-align: right;">80</p> <p>1 Q. Who owned the trucks? You didn't know that, 2 did you? 3 A. No. 4 Q. You didn't know who was driving the trucks, 5 right? 6 A. No. 7 Q. You didn't know who employed the employees 8 who were loading the trucks at the warehouse, did you? 9 A. I don't know. 10 Q. And you didn't even know where the warehouse 11 was located correct, sir? 12 A. No. 13 Q. And you have no idea after you signed those 14 checks who was receiving them, do you? 15 A. No. 16 Q. Or how those checks were being applied, 17 right? 18 A. No. 19 Q. And you don't even know what entity was 20 reporting the monies received pursuant to those checks 21 as income on their taxes, do you? 22 A. Well, all I remember there was once upon a 23 time Harrison checks were made, I signed it. Later on 24 it was Imperial checks on my desk, I signed it, and 25 mailed it.</p>

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<p style="text-align: right;">85</p> <p>1 Q. You know nothing about the relationship, 2 correct? 3 A. No. 4 Q. How did you first learn of Imperial? 5 A. I don't remember. I think three years back 6 when Brad came. I don't know. 7 Q. So you had never heard of Imperial until you 8 met with Mr. Prendergrast three years ago? 9 A. Well, I start remembering when I was signing 10 checks to Imperial. So that's all. I did Harrison 11 and then Imperial. 12 Q. Okay. So you first learned of Imperial when 13 someone put a check in front of you to sign that was 14 addressed to Imperial; is that right? 15 A. Yes. 16 Q. And did you ask why is this check addressed 17 to Imperial at that time? 18 A. No, I don't ask. 19 Q. You just signed it? 20 A. I signed it. 21 Q. So it didn't matter to you who the check was 22 addressed to, did it? 23 A. No. 24 Q. Do you know anything about A-Z's account 25 numbers with Harrison?</p>	<p style="text-align: right;">87</p> <p>1 Q. Other than the fact that you were addressing 2 checks to Imperial, what do you know about Imperial? 3 A. Nothing. I don't know. All I was signing 4 checks. 5 Q. You never placed an order yourself with 6 Imperial, did you? 7 A. Repeat the question. 8 Q. You personally never placed any order with 9 Imperial, correct? 10 A. No. 11 Q. And you never spoke with anyone at Imperial, 12 did you, sir? 13 A. No. 14 Q. Do you even know where Imperial is located? 15 A. No. 16 Q. I believe you testified earlier once you sent 17 a check off, you have no idea how it was applied, 18 correct? 19 A. Correct. 20 Q. Doesn't matter if you made it payable to 21 Harrison or if you made it payable to Imperial, you 22 don't know what happened to that check, right? 23 A. No. 24 Q. And you don't know who reported those sales 25 on their taxes?</p>
<p style="text-align: right;">86</p> <p>1 A. No, I don't know. 2 Q. Do you know if those account numbers ever 3 changed? 4 A. I don't know really. 5 Q. So you don't know if the account numbers ever 6 changed? 7 A. I don't know. 8 Q. So you wouldn't know if they changed why they 9 changed, would you, sir? 10 A. I don't know. 11 Q. And I asked you earlier about Harrison's 12 internal operations. You said you had no knowledge of 13 those operations, right? 14 A. Yeah, I don't know. 15 Q. And so you don't know anything about 16 Imperial's operations either, do you, sir? 17 A. No. 18 Q. You don't know anything about its accounting 19 procedures, correct? 20 A. No. 21 Q. Nothing about its employees, correct? 22 A. No. 23 Q. And nothing about its relationship with 24 Harrison, right? 25 A. No.</p>	<p style="text-align: right;">88</p> <p>1 A. No. 2 Q. Because you have no personal knowledge of 3 Harrison or Imperial's internal accounting practices, 4 correct, sir? 5 A. I don't need to know. 6 Q. I didn't ask you if you need to know. I 7 asked if you do know. 8 A. No. 9 Q. What do you know about A-Z's payment terms 10 with Harrison, sir? 11 A. I don't know. 12 Q. You know nothing about the payment terms? 13 A. No. 14 Q. Okay. And you testified earlier you 15 believed you were -- or you believed A-Z at some point 16 started purchasing from Imperial, correct? 17 A. I can recognize only with the checks, when I 18 was signing the checks. 19 Q. Okay. So you know nothing about any alleged 20 payments terms between A-Z and Imperial, do you, sir? 21 A. No. 22 Q. How much do you believe A-Z owes Imperial? 23 A. I don't know. 24 Q. Do you believe that A-Z owes Imperial money? 25 A. I don't know.</p>

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<p>1 A. Yeah, I signed it, yes.</p> <p>2 Q. I want to take a look at paragraph 3 on page</p> <p>3 2, please.</p> <p>4 A. Okay.</p> <p>5 Q. And that first sentence of paragraph 3</p> <p>6 states, on September 1st, 2018, Imperial Trading</p> <p>7 Company, LLC, Imperial, acquired Harrison and took</p> <p>8 over the process of fulfilling all orders. Did I read</p> <p>9 that correctly?</p> <p>10 A. Okay.</p> <p>11 Q. I read that correctly?</p> <p>12 A. Yes.</p> <p>13 Q. And, sir, what is the basis, the factual</p> <p>14 basis, for that statement?</p> <p>15 A. I don't remember.</p> <p>16 Q. Is that statement accurate in your opinion</p> <p>17 sitting here today?</p> <p>18 A. Yes.</p> <p>19 Q. Based on what?</p> <p>20 A. Based on signing the checks.</p> <p>21 Q. Okay. But you told me that you stopped</p> <p>22 making payment to Harrison in 2015, did you not?</p> <p>23 A. No, I was signing checks, not stop payment.</p> <p>24 I was signing checks to Harrison in 2014, '15, and</p> <p>25 then I was signing checks to Imperial later on. Why</p>	<p>1 time I was just signing the checks.</p> <p>2 Q. Okay. So you know nothing about the</p> <p>3 submission of orders from A-Z to Imperial, do you?</p> <p>4 A. Why don't you show me the invoices?</p> <p>5 Q. I'm asking you about your declaration, sir.</p> <p>6 We can talk about invoices next.</p> <p>7 A. Yeah, I was signing the checks based on that.</p> <p>8 Q. And to generate an invoice, you first have to</p> <p>9 have an order, right? You order the goods, you get</p> <p>10 invoiced for the goods, you pay the invoice. That's</p> <p>11 how the process works, right?</p> <p>12 A. Yeah, but I was signing the checks. The last</p> <p>13 number is mine.</p> <p>14 Q. So you were involved in part 3 of that</p> <p>15 chronology. We're talking about part 1, orders</p> <p>16 submitted to representatives of Imperial. You have no</p> <p>17 personal knowledge of that, do you, sir?</p> <p>18 A. Every company have people to work on those</p> <p>19 processes. My job was to sign the checks.</p> <p>20 Q. So my question to you, sir, is what is the</p> <p>21 factual basis for your statement in your declaration</p> <p>22 that all orders were submitted to representatives of</p> <p>23 Imperial?</p> <p>24 A. Sign the check.</p> <p>25 Q. So you have no personal knowledge of the</p>
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<p>1 you confusing the language?</p> <p>2 Q. And the date in this paragraph 3 is September</p> <p>3 1, 2018. Do you see that, sir?</p> <p>4 A. Yeah.</p> <p>5 Q. What is that date based on?</p> <p>6 A. I don't know.</p> <p>7 Q. And you testified earlier you don't know</p> <p>8 anything about the relationship between Harrison and</p> <p>9 Imperial; is that right?</p> <p>10 A. Yeah.</p> <p>11 Q. And then beginning midway of line 3 through</p> <p>12 paragraph 3 of your declaration you state, all orders</p> <p>13 were submitted to representatives of Imperial and all</p> <p>14 invoices were sent from Imperial. Did I read that</p> <p>15 correctly?</p> <p>16 A. Uh-huh, yes.</p> <p>17 Q. You weren't involved in submitting orders,</p> <p>18 were you, sir, on behalf of A-Z?</p> <p>19 A. No.</p> <p>20 Q. So what is the factual basis for your</p> <p>21 statement that all orders were submitted to</p> <p>22 representatives of Imperial?</p> <p>23 A. Signing checks.</p> <p>24 Q. That's payment.</p> <p>25 A. Yeah, that's all I know from this time to</p>	<p>1 order process, the order form and the payment?</p> <p>2 A. I was signing checks. That's all.</p> <p>3 Q. Okay. And so then step 2 in that chronology</p> <p>4 is the invoice. You state all invoices were sent from</p> <p>5 Imperial. What is the basis for your statement that</p> <p>6 invoices were sent from Imperial?</p> <p>7 A. It says from period October 18 and March 19.</p> <p>8 I mean, those invoices I was not looking at the</p> <p>9 invoices. All I was signing the checks.</p> <p>10 Q. Right. So you have no personal knowledge as</p> <p>11 to whether Imperial or Harrison was sending invoices</p> <p>12 to A-Z, do you, sir?</p> <p>13 A. No, at that time, Harrison was stopped</p> <p>14 because Harrison was paid off. Harrison was done.</p> <p>15 You are in 2021. You're not in 2015. 2015 Harrison</p> <p>16 was paid off zero dollars. My guarantees null and</p> <p>17 void. I'm done with Harrison. Imperial start</p> <p>18 sending. I was signing the checks to Imperial at that</p> <p>19 time.</p> <p>20 Q. Okay. So you don't know who was receiving</p> <p>21 orders from A-Z or who was sending invoices to A-Z, do</p> <p>22 you, sir?</p> <p>23 A. No.</p> <p>24 Q. And you don't know if either person was</p> <p>25 employed by Harrison or Imperial, do you, sir?</p>

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<p style="text-align: right;">125</p> <p>1 A. What is that question? 2 Q. You don't know if the person receiving the 3 order from A-Z was employed by Harrison or Imperial, 4 do you, sir? 5 A. The question is kind of funny, no. 6 MR. UNIS: Madam Court Reporter, can you 7 read it back, please? 8 (Record read.) 9 A. I'm not running Harrison, sure. Imperial, 10 sure. Who was getting the orders I don't know. 11 That's kind of a funny question. 12 Q. (BY MR. UNIS) You don't know who is 13 receiving the order in Bossier City, Louisiana, do 14 you, sir? 15 A. I don't want to talk something to you that 16 it's a dumb question, man. 17 Q. Well, but the dumb question -- 18 A. I don't know, man. I don't know who was 19 getting the order, Imperial or Harrison. How do I 20 know? Does Joe got it or John got it or Sam got it? 21 I don't know. You're asking some dumb question. 22 That's why I'm kind of confused. What are you asking? 23 Q. I'm just trying to understand your 24 declaration because you state that A-Z was submitting 25 the orders to representatives of Imperial. I'm asking</p>	<p style="text-align: right;">127</p> <p>1 place the orders between A-Z and Imperial. He did not 2 place the order between A-Z and Harrison. 3 MR. UNIS: In his signed declaration he 4 has personal knowledge. I'm just trying to run these 5 facts to the ground. 6 MR. AMAR ALI: You've asked the question 7 at least 20 times. At least. That's a conservative 8 number. 9 MR. UNIS: Well, I'm just trying to 10 figure out why it's in the declaration if he doesn't 11 know. 12 MR. AMAR ALI: It's in the declaration 13 because A-Z was placing those orders. A-Z informed 14 him that they were placing the orders to Imperial. 15 MR. UNIS: So he has no personal 16 knowledge. 17 Q. (BY MR. UNIS) You have no personal 18 knowledge, sir? If you just answer that question, we 19 can move on. 20 MR. AMAR ALI: We've moved on. We've 21 moved on. You haven't moved on. 22 MR. UNIS: You would like to move on and 23 you'll have your opportunity on Thursday, sir. I'm 24 asking the fact witness -- 25 A. I'm telling you you are asking dumb</p>
<p style="text-align: right;">126</p> <p>1 you how you know they were representatives of 2 Imperial? 3 A. Because I was signing the checks. My job was 4 to sign the checks and based on signing the checks 5 long time ago I used to sign it and then later on 6 Imperial I have been telling you a hundred times. 7 Whoever read -- 8 Q. So you were not involved -- 9 A. -- this deposition get bored. 10 Q. Thank you, sir. You were not involved in 11 placing orders, right? 12 MR. AMAR ALI: We've gone over this how 13 many times today. He did not place the orders. He 14 did not receive the orders. He did not look at the 15 invoices. He signed the checks. The orders were 16 placed by A-Z to Harrison and at some point later they 17 were placed to Imperial. A-Z paid Harrison. After 18 Harrison wasn't owed any money, then Imperial was 19 paid. 20 MR. UNIS: I'm objecting whatever, this 21 testimony, sidebar, narrative. 22 MR. AMAR ALI: You keep asking him over 23 and over again if he placed the order. Let's go back 24 and look at the deposition transcript and see how many 25 times you've asked that same question. He did not</p>	<p style="text-align: right;">128</p> <p>1 questions. I think you are just killing your time. 2 You are actually wasting my time. You are making 3 money. I'm not making money. You billing your 4 client. Who am I going to bill for wasting my time 5 for asking same question for 120 times? Come on, man. 6 MR. AMAR ALI: I mean, why don't you just 7 put the invoices up from October 22nd, 2018 to March 8 4th, 2019. Put the invoices up and go through those. 9 MR. UNIS: I appreciate you wanting to 10 coach the deposition, sir. 11 MR. AMAR ALI: I'm not coaching the 12 deposition. I'm just sitting here. I know he's 13 tired. It's getting late. You said you're going to 14 go until 5:00, but you keep asking the same question. 15 We are going to be here until 8:00. 16 A. Hey, God bless you, man. Keep on billing 17 your client, but don't waste my time, buddy. 18 Q. (BY MR. UNIS) I would like to look at 19 paragraph 6 of your declaration, sir, if you and your 20 son are done with your rant. Can we agree to go to 21 paragraph 6 at page 3? 22 A. Page 3 is it? 23 MR. AMAR ALI: No, it's paragraph 6. 24 THE WITNESS: Paragraph 6. 25 Q. (BY MR. UNIS) Are you there?</p>

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: BARKAT G. ALI JANUARY 5, 2021

3 PAGE LINE CHANGE REASON

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1 I, BARKAT G. ALI, have read the foregoing  
 2 deposition and hereby affix my signature that same is  
 3 true and correct, except as noted above.

4 \_\_\_\_\_  
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 6 \_\_\_\_\_  
 7 \_\_\_\_\_  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 THE STATE OF \_\_\_\_\_)  
 11 COUNTY OF \_\_\_\_\_)

12 Before me, \_\_\_\_\_, on this  
 13 day personally appeared BARKAT G. ALI, known to me (or  
 14 proved to me under oath or through \_\_\_\_\_)  
 15 (description of identity card or other document) to be  
 16 the person whose name is subscribed to the foregoing  
 17 instrument and acknowledged to me that they executed  
 18 the same for the purposes and consideration therein  
 19 expressed.

20 Given under my hand and seal of office this  
 21 \_\_\_\_\_ day of \_\_\_\_\_, 2021.

22 \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 NOTARY PUBLIC IN AND FOR  
 THE STATE OF \_\_\_\_\_  
 25 My commission expires: \_\_\_\_\_

1 STATE OF TEXAS )

2 COUNTY OF DALLAS )

3 I, Audra B. Paty, Certified Shorthand

4 Reporter, in and for the State of Texas, certify that  
 5 the foregoing deposition of BARKAT G. ALI was reported  
 6 stenographically by me at the time and place  
 7 indicated, said witness having been placed under oath  
 8 by me; that review was requested pursuant to Federal  
 9 Rule of Civil Procedure 30(e)(1); and that the  
 10 deposition is a true record of the testimony given by  
 11 the witness.

12 I further certify that I am neither counsel  
 13 for nor related to any party in this cause and am not  
 14 financially interested in its outcome.

15 Given under my hand on this the 11th day of  
 16 January, 2021. *Audra B. Paty*

17 \_\_\_\_\_  
 18 Audra B. Paty, Certified  
 19 Shorthand Reporter No. 5987  
 20 Dickman Davenport, Inc.  
 21 Firm Registration #312  
 22 4228 North Central Expressway  
 23 Suite 101  
 24 Dallas, Texas 75206  
 25 214.855.5100 800.445.9548  
 e-mail: abp@dickmandavenport.com  
 My commission expires 10-31-22

23 Time used by each party:

24 Mr. Joseph Anthony Unis, Jr. - 5:13  
 Ms. Joyce W. Lindauer - 0:00

25